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10
11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF NEVADA**

13 YAUSMENDA FREEMAN,

Case No. 2:21-cv-01117-JAD-NJK

14 Plaintiff,

15 v.

16 TRANSUNION, LLC,

17 Defendant.

18
19 **UNOPPOSED MOTION AND ORDER**
EXTENDING DEFENDANT TRANS
UNION LLC'S TIME TO FILE A
REPLY TO PLAINTIFF'S OPPOSITION
TO TRANS UNION LLC'S MOTION TO
DISMISS PLAINTIFF'S THIRD
AMENDED VERIFIED PETITION TO
PERPETUATE TESTIMONY
(FIRST REQUEST)

20 Plaintiff Yausmenda Freeman (“Plaintiff”) and Defendant Trans Union LLC (“Trans
21 Union”), by and through their respective counsel, file this Unopposed Motion Extending
22 Defendant Trans Union’s Time to File a Reply to Plaintiff’s Opposition to Trans Union LLC’s
23 Motion to Dismiss Plaintiff’s Third Amended Verified Petition to Perpetuate Testimony.

24 1. On September 21, 2021, Trans Union filed its Opposition and Motion to Dismiss
25 Plaintiff’s Third Amended Petition to Perpetuate Testimony. On October 15, 2021, Plaintiff
26 filed her Opposition to Trans Union LLC’s Motion to Dismiss Plaintiff’s Third Amended
27 Petition to Perpetuate Testimony.

2. On October 20, 2021, counsel for Trans Union communicated with Plaintiff via telephone regarding an extension within which to file a Reply to her Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony and agreed to a 7 day extension.

3. Trans Union's counsel needs additional time to review the documents and respond to the allegations in Plaintiff's Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony. Furthermore, Counsel for Trans Union will be out of the office for numerous days this week to attend her grandfather's funeral. Furthermore, Trans Union is working with Plaintiff to determine what information Plaintiff specifically seeks from Trans Union in an effort to resolve Plaintiff's Third Amended Petition without the need to utilize further judicial resources. This Unopposed Motion is made in good faith and not for the purposes of delay.

4. Plaintiff did not oppose and agreed to October 29, 2021, as the deadline for Trans Union to Reply to her Opposition to Trans Union LLC's Motion to Dismiss Plaintiff's Third Amended Petition to Perpetuate Testimony.

Dated this 22nd day of October, 2021.

Quilling Selander Lownds Winslett & Moser, P.C.

/s/ *Jennifer Bergh*

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Counsel for Trans Union LLC

IT IS SO ORDERED.

Dated: October 22, 2021

IT IS SO ORDERED.
Dated: October 22, 2021



Nancy J. Koppe
United States Magistrate Judge